

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

TAMARA HARRIS,

**NOTICE OF  
APPLICATION FOR  
COSTS SOUGHT  
AGAINST PLAINTIFF**

Plaintiff,

-against-

08 Civ. 1703 (MKB)

JOAN RITTER, ESQ., JOHN RYAN, ESQ., JIM  
QUINN, ESQ. LAURA HENIGMAN, ESQ. and  
LIEUTENANT STEPHANIE HUNTER,

Defendants.

----- X

**PLEASE TAKE NOTICE** that, upon defendants' bill of costs, the Declaration of Christopher A. Seacord, dated August 09, 2012 and the exhibits annexed thereto, and all other pleadings and proceedings had herein, defendants will move this Court before the Judgment Clerk, at the United States Courthouse for the Southern District of New York, located at 225 Cadman Plaza East Brooklyn, New York at 10 a.m. on August 27, 2012 or as soon thereafter as counsel may be heard, for an order pursuant to Rule 54 of the Federal Rules of Civil Procedure, Local Civil Rule 54.1 and 28 U.S.C. §§1921 and 1920 granting fees and costs sought by defendants and granting

such other and further relief as this Court deems just and proper.

Date: New York, New York  
August 09, 2012

MICHAEL A. CARDOZO  
Corporation Counsel of the City of New York  
Attorney for the Defendants  
100 Church Street, Room 2-122  
New York, New York 10007  
212-788-0866

By: \_\_\_\_\_/s/\_\_\_\_\_  
Christopher A. Seacord  
Assistant Corporation Counsel  
[Cseacord@law.nyc.gov](mailto:Cseacord@law.nyc.gov)

To. **Tamara M. Harris**  
The Law Office of Tamara M. Harris  
350 Broadway  
Suite 400  
New York, New York 10013  
[Totallytammy@yahoo.com](mailto:Totallytammy@yahoo.com)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- x  
TAMARA HARRIS,

Plaintiff,

-against-

JOAN RITTER, ESQ., JOHN RYAN, ESQ., JIM QUINN,  
ESQ. LAURA HENIGMAN, ESQ. and LIEUTENANT  
STEPHANIE HUNTER,

Defendants.

**DECLARATION OF  
CHRISTOPHER A.  
SEACORD, IN  
SUPPORT OF  
DEFENDANTS'  
APPLICATION FOR  
COSTS AGAINST  
PLAINTIFF**

08 Civ. 1703 (MKB)

----- x  
**Christopher A. Seacord**, declares pursuant to 28 U.S.C. §1746 and under penalty of perjury that:

1. I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, counsel for the defendants in this action. As such, I am familiar with the facts and circumstances set forth herein.

2. I submit this Declaration in support of defendants' bill of costs and defendants' application for an award of costs against plaintiff Tamara Harris ("plaintiff") in this action.

3. Plaintiff commenced this action by filing a complaint on or about April 24, 2008 alleging that defendants wrongfully terminated and violated plaintiff's First and Fourteenth Amendment rights.

4. On June 18, 2012, a jury trial in this action commenced in the Eastern District of New York located at 225 Cadman Plaza East Brooklyn, New York, before the Honorable Margo K. Brodie.

5. The jury trial concluded on July 10, 2012, and the jury entered a verdict in favor of all defendants on all claims. Judgment was entered on July 11, 2012. A copy of the judgment is annexed hereto as Exhibit "A."

6. Defendants are entitled to costs as the prevailing party pursuant to Rule 54 (d)(1) of Federal Rules of Civil Procedure (herein after, "Fed. R. Civ. P."), insofar as the Court entered judgment for the defendants on all claims against them.

7. Defendants now seek an award of costs in the amount of \$11,264.83 as the prevailing party in accordance with Rule 54(d)(1) of the Fed. R. Civ. P. and Rule 54.1 of the Local Civil Rules of the Eastern District of New York for the following items. The costs claimed are correctly stated, are allowable by law, and were necessarily incurred as stated herein. Attached hereto as Exhibit "B" is defendant's Bill of Costs dated August 08, 2012.

8. Defendants submit a bill for the costs of the trial transcripts necessarily obtained for the purposes of cross-examinations and preparing further argument at the close of evidence. Defendants are entitled to these costs in the amount of \$8,352.56 as the prevailing party. A true copy of the invoices from the official court reporters are annexed hereto as Exhibit "C."

9. Defendants submit a bill for the cost of the deposition transcript of Plaintiff Tamara Harris that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the invoices from the stenographer is annexed hereto as Exhibit "D." As indicated, the total cost of plaintiff's deposition is \$920.77.

10. Defendants submits a bill for the cost of the deposition transcript of defendant Stephanie Hunter that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the

invoices from the stenographer is annexed hereto as Exhibit "E." As indicated, the total cost of defendant Hunter's deposition is \$181.50.

11. Defendants submits a bill for the cost of the deposition transcript of defendant Joan Ritter, Esq. that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the invoices from the stenographer is annexed hereto as Exhibit "F." As indicated, the total cost of defendant Ritter's deposition is \$544.80

12. Defendants submits a bill for the cost of the deposition transcript of defendant John Ryan, Esq. that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the invoices from the stenographer is annexed hereto as Exhibit "G." As indicated, the total cost of defendant Ryan's deposition is \$337.40.

13. Defendants submits a bill for the cost of the deposition transcript of non-party witness Craig Abruzzo that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the invoices from the stenographer is annexed hereto as Exhibit "H." As indicated, the total cost of witness Abruzzo's deposition is \$155.40.

14. Defendants submits a bill for the cost of the deposition transcript of defendant Laura Henigman, Esq. that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the invoices from the stenographer is annexed hereto as Exhibit "I." As indicated, the total cost of defendant Heningman deposition is \$331.60.

15. Defendants submits a bill for the cost of the deposition transcript of defendant Jim Quinn, Esq. that was necessary for use at trial, preparing the papers supporting defendants' motion for summary judgment, and the cross-examination of the plaintiff. A true copy of the invoices from the stenographer is annexed hereto as Exhibit "J." As indicated, the total cost of defendant Quinn deposition is \$440.80.

**WHEREFORE**, it is respectfully requested that the Clerk issue an order granting defendants costs in the amount of \$11,264.83.

Dated: New York, New York  
August 09, 2012

/s/  
Christopher A. Seacord  
Assistant Corporation Counsel

**EXHIBIT A**

AO 450 (Rev. 11/11) Judgment in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 11 2012 ★

**BROOKLYN OFFICE**

TAMARA HARRIS

Plaintiff

v.

JOAN RITTER, ESQ., JOHN RYAN, ESQ., JIM QUINN,  
ESQ., LAURA HENIGMAN, ESQ. and LIEUTENANT  
STEPHANIE HUNTER,

Defendant

Civil Action No. 08-CV-1703 (MKB)

**JUDGMENT IN A CIVIL ACTION**

The court has ordered that (check one):

☐ the plaintiff (name) \_\_\_\_\_ recover from the  
defendant (name) \_\_\_\_\_ the amount of  
\_\_\_\_\_ dollars (\$ \_\_\_\_\_), which includes prejudgment  
interest at the rate of \_\_\_\_\_ %, plus post judgment interest at the rate of \_\_\_\_\_ % per annum, along with costs.

☐ the plaintiff recover nothing, the action be dismissed on the merits, and the defendant (name) \_\_\_\_\_  
recover costs from the plaintiff (name) \_\_\_\_\_

☒ other: The Jury rendered a verdict in favor of the defendants on all claims.

This action was (check one):

☒ tried by a jury with Judge \_\_\_\_\_ Margo K. Brodie \_\_\_\_\_ presiding, and the jury has  
rendered a verdict.

☐ tried by Judge \_\_\_\_\_ without a jury and the above decision  
was reached.

☐ decided by Judge \_\_\_\_\_ on a motion for \_\_\_\_\_

Date: 07/10/2012

CLERK OF COURT

s/Ogoro Francis

Signature of Clerk or Deputy Clerk



**EXHIBIT B**

AO 133

(Rev. 8/06) Bill of Costs

**UNITED STATES DISTRICT COURT**  
SOUTHERN District of NEW YORK

TAMARA HARRIS, Plaintiff,

**BILL OF COSTS**

V.

JOAN RITTER, ESQ., et al., Defendants.

Case Number: 08 Civ. 1703 (MKB)(LB)

Judgment having been entered in the above entitled action on 7/11/2012 against Plaintiff TAMARA HARRIS,  
the Clerk is requested to tax the following as costs: Date

Fees of the Clerk .....	\$ _____
Fees for service of summons and subpoena .....	_____
Fees of the court reporter for all or any part of the transcript necessarily obtained for use in the case .....	8,352.56
Fees and disbursements for printing .....	_____
Fees for witnesses (itemize on page two) .....	0.00
Fees for exemplification and copies of papers necessarily obtained for use in the case .....	_____
Docket fees under 28 U.S.C. 1923 .....	_____
Costs as shown on Mandate of Court of Appeals .....	_____
Compensation of court-appointed experts .....	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828 .....	_____
Other costs (please itemize) .....	2,912.27
<b>TOTAL</b>	<b>\$ 11,264.83</b>

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

**DECLARATION**

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

- ☐ Electronic service by e-mail as set forth below and/or.
- ☐ Conventional service by first class mail, postage prepaid as set forth below.

s/ Attorney: \_\_\_\_\_

Name of Attorney: Christopher A. SeacordFor: The City of New York, et al.Date: 8/8/2012

Name of Claiming Party

Costs are taxed in the amount of \_\_\_\_\_ and included in the judgment.

Clerk of Court

By: \_\_\_\_\_

Deputy Clerk

Date

**WITNESS FEES (computation, cf. 28 U.S.C. 1821 for statutory fees)**

## NOTICE

"Sec. 1924. Verification of bill of costs."

**See also Section 1920 of Title 28, which reads in part as follows:**

“A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree.”

**Rule 54 (d)**

Rule 6(e)

“Whenever a party has the right or is required to do some act or take some proceedings within a prescribed period after the service of a notice or other paper upon him and the notice or paper is served upon him by mail, 3 days shall be added to the prescribed period.”

### Rule 58 (In Part)

**"Entry of the judgment shall not be delayed for the taxing of costs."**

**EXHIBIT C**

AO44  
(Rev. 11/07)UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

INVOICE NO: 00001117

**MAKE CHECKS PAYABLE TO:**

Christopher A. Seacord  
New York City Law Department  
Office of the Corporation Counsel  
100 Church Street  
New York, NY 10007-2601

Phone: (212) 788-0866  
FAX: (212) 788-8877

[cseacord@law.nyc.gov](mailto:cseacord@law.nyc.gov)

Marie Foley, RMR, CRR

225 Cadman Plaza East  
Room N358  
Brooklyn, NY 11201

Phone: (718) 613-2596  
FAX: (718) 613-2648

Tax ID: 26-3998433  
[Marie\\_Foley@nyed.uscourts.gov](mailto:Marie_Foley@nyed.uscourts.gov)

☐ CRIMINAL ☒ CIVIL

DATE ORDERED:

06-18-2012

DATE DELIVERED:

06-18-2012

**Case Style:** 08-CV-1703 (MKB), IN RE: HARRIS v. QUEENS COUNTY DA's OFFICE et al  
Court reporter's pdf transcript of trial proceedings held on June 18, 19,  
20, 21, and 22, 2012.  
spilt rate bill with opposing parties full transcript on the 18th,  
excerpt transcripts on 19th, 20th, 21st and 22nd

CATEGORY	ORIGINAL			1ST COPY			2ND COPY			TOTAL CHARGES		
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL			
Ordinary												
14-Day												
Expedited												
Daily												
Hourly	642	4.59	2,946.78	482	3.46	1,667.72				4,614.50		
Realtime												
Misc. Desc. Index - 24pgs @ 3.46 = 83.04 / 120pgs @ 4.59 = 550.80										MISC. CHARGES:	633.84	
										TOTAL:	5,248.34	
										LESS DISCOUNT FOR LATE DELIVERY		
										TAX (If Applicable):		
										LESS AMOUNT OF DEPOSIT:		
										TOTAL REFUND:		
Date Paid:										Amt:	TOTAL DUE:	\$5,248.34

**ADDITIONAL INFORMATION**  
Full price may be charged only if the transcript is delivered within the required time frame. For example, if an ord for expedited transcript is not completed and delivered within seven (7) calendar days, payment would be at the ordinary delivery rate.

**CERTIFICATION**

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE

DATE

06-18-2012

(All previous editions of this form are  
cancelled and should be destroyed)

# INVOICE

Mary Agnes Drury, RPR  
Official Court Reporter  
US District Court – Eastern District of New York  
225 Cadman Plaza East  
3<sup>rd</sup> Floor  
Brooklyn, New York 11201  
(718) 613-2615  
mad78910@yahoo.com

**June 28, 2012**

New York City Law Department  
100 Church Street  
New York, New York 10007  
www.law.nyc.gov  
(212) 788-3934  
Attn: Christopher Aaron Seacord, Esq.  
cseacord@law.nyc.gov

**Case:** Tamara Harris vs Queens County DA's Office et al

**Case Number:** 08-CV-1703

Civil Cause for Jury Trial

**Date of Proceeding:** 7/9/12 and 7/10/12

Number of Pages: 336 Pgs of Transcript and 53 Pgs of All Word Index = 389 pages

Rate: Immediate \$7.98

Total Due: \$3,104.22

**Thank you so very much !!!**

**EXHIBIT D**

RECEIVED  
FISCAL UNIT  
NYC LAW DEPT.

Fri

## Five Star Reporting, Inc.

## Invoice

Beautiful depo suites available in all boroughs...

2010 OCT -8 PM 12:00

3132 Union Boulevard

Invoice Date

Invoice #

Thursday, August 05, 2010

6804JF

East Islip, New York 11730

Phone: (631) 224-5054

Fax: (631) 224-3926

Christopher Aaron Seacord

Michael A. Cardozo, Esq.

100 Church Street

4th Floor

New York, NY 10007

I HEREBY CERTIFY: That the articles/services specified on this invoice have been received/verified as to the quality and quantity, and fit of the

Phone:

Fax:

Witness: Tamara M. Harris

Case: Tamara M. Harris -v- Queens County DA's Office

Venue:

Case #:

Date: 7/20/2010 ✓

Start Time: 10:00 AM

End Time: 2:41 PM

Reporter: Stephanie Valder

Claim #:

File #:

NOTICE INITIALS  
2ND. EC  
3RD.  
4TH.  
5TH.DATE  
10/10/10

If any problems, please return to Fiscal with comments:

1115JF

Item	Description	Quan	Total
TRAN	Original + 1 transcripts share	247	\$876.85
DAPP	A.M. and P.M. Appearance fees	1	\$70.00
PSTG	Postage /Hndlg / Delivery	1	\$18.50

Sub Total \$974.35  
Payments \$0.00  
Balance Due \$974.35

VOUCHERED

DATE: 10 / 13 / 10

INV. AMT. PAID: \$ 920.77

V#

11-1722

INV. #

6804JF

SVS. PERIOD 07/20/10 TO 07/20/10

AG. 025 : B/C 020 : DET. OBI 6220  
Fed. I.D. # 03-0559320

REF. DOC. Visa, Mastercard &amp; American Express accepted. Payment is due upon receipt.

Thank you for your business.

2010 AUG 9 PM 2:02

842.27  
60.00

920.77

2010 AUG -9 PM 2:02  
FISCAL UNIT  
NYC LAW DEPT.



**EXHIBIT E**

## INVOICE

RECEIVED  
FISCAL UNIT  
NYC LAW DEPT.

2010 NOV -1 AM 9:49

LEX  
REPORTING SERVICE, INC.BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Job No.</b>
99818	10/4/2010	81255
<b>Job Date</b>	<b>Case No.</b>	
9/13/2010		
<b>Case Name</b>		
HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE		
<b>Payment Terms</b>		
Net 30. After 30, Int. at 1.5% per month		

I certify that the articles and  
services specified on this invoice  
have been received and valued as  
to the quality and quantity.TRANSCRIPT  
STEPHANIE HUNTER  
HANDLING & DELIVERY111.00 Pages @ 1.50 166.50  
15.00 15.00  
TOTAL DUE >>> \$181.50Reference No. : TT007-022581  
Ordered By : CHRISTOPHER AARON SEACORD, ESQ.  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

Invoice Inquiries call 631-543-3566

VOUCHERED  
DATE: 12/29/10

APPROVED

INV. AMT. PAID: \$ 181.50

Tax ID: 11-3033646

V# 20110003008

Phone: 212-788-0303 Fax: 212-788-0357

INV Please detach bottom portion and return with payment.

SVS. PERIOD 9/13/10 TO 8/13/11 Job No. 81255

BU ID : LEXNYC

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

B/C

DET. OBI

Case No. 6220  
Case Name : HARRIS, TAMARA V. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE

Invoice No. : 99818 Invoice Date : 10/4/2010

Total Due : \$ 181.50

Remit To: LEX Reporting Service, Inc.  
160 Broadway, 14th Floor  
New York, NY 10038

## PAYMENT WITH CREDIT CARD



Cardholder's Name: \_\_\_\_\_

Card Number: \_\_\_\_\_

Exp. Date: \_\_\_\_\_ Phone#: \_\_\_\_\_

Billing Address: \_\_\_\_\_

Zip: \_\_\_\_\_ Card Security Code: \_\_\_\_\_

Amount to Charge: \_\_\_\_\_

Cardholder's Signature: \_\_\_\_\_

Scanned 12/1

**EXHIBIT F**



REPORTING SERVICE, INC.

**INVOICE**

Invoice No.	Invoice Date	Job No.
101079	11/29/2010	81184
Job Date	Case No.	
9/7/2010		
Case Name		
HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE		
Payment Terms		
Net 30. After 30, Int. at 1.5% per month		

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

2007-02-2581-LE

0371027653  
I certify that the articles and services specified on this invoice have been received and verified as to the quality and quantity.

## TRANSCRIPT

JOAN RITTER, ESQ.

HANDLING &amp; DELIVERY

Ordered By : CHRISTOPHER AARON SI  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

Invoice Inquiries call 631-543-3566

98.00 Pages @ 2.60 514.80  
30.00 30.00  
**TOTAL DUE >>> \$544.80**

**APPROVED**

RECEIVED  
FISCAL UNIT  
NYC LAW DEPT

2010 DEC -1 AM 9:06

**VOUCHERED**  
**DATE: 12/3/10**

INV. AMT. PAID: \$ 544.80

Tax ID: 11-3033646

Phone: 212-788-0303 Fax: 212-788-0357

Please detach bottom portion and return with payment.

SVS. PERIOD 9/7/10 TO 9/7/10

Job No. 81184

BU ID : 1-LEXNYC

## BILL TO

CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

AG. 0201 : B/C 0201 : DET. OBJ. : 6220

Case Name : HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE

Invoice No. : 101079

Invoice Date : 11/29/2010

**Total Due : \$ 544.80**

Remit To: **LEX Reporting Service, Inc.**  
**160 Broadway, 14th Floor**  
**New York, NY 10038**

**PAYMENT WITH CREDIT CARD**

Cardholder's Name: \_\_\_\_\_

Card Number: \_\_\_\_\_

Exp. Date: \_\_\_\_\_ Phone#: \_\_\_\_\_

Billing Address: \_\_\_\_\_

Zip: \_\_\_\_\_ Card Security Code: \_\_\_\_\_

Amount to Charge: \_\_\_\_\_

Cardholder's Signature: \_\_\_\_\_

**EXHIBIT G**



REPORTING SERVICE, INC.

**INVOICE**

Invoice No.	Invoice Date	Job No.
101077	11/29/2010	81287
Job Date	Case No.	
9/15/2010		
Case Name		
HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE		
Payment Terms		
Net 30. After 30, Int. at 1.5% per month		

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

2007-022581-LE

03110216023

I certify that the articles and  
services specified on this invoice  
have been received and verified as  
to the quality and quantity.

## TRANSCRIPT

JOHN RYAN, ESQ.

## TRANSCRIPT

CRAIG ABRUZZO

HANDLING &amp; DELIVERY

124.00 Pages @ 2.60 322.40

54.00 Pages @ 2.60 140.40

30.00 30.00

**TOTAL DUE >>>****\$492.80**

Ordered By

CHRISTOPHER AARON S. CAULFIELD, ESQ., TLE  
CITY OF NEW YORK LAW  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

**APPROVED**

Invoice Inquiries call 631-543-3566

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FISCAL UNIT  
NYC LAW DEPT

2010 DEC -1 AM 9:46

093

**VOUCHERED**  
**DATE: 12/3/10**

Tax ID: 11-3033646

INV. AMT. PAID: \$ 492.80

Phone: 212-788-0303 Fax: 212-788-0357

Please detach bottom portion and return with payment.

V# 20110052619

Job No. : 81287

BU ID : 1-LEXNYC

## BILL TO

CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

INV. # 11-101077

SVS. PERIOD

9/15/10 TO 9/15/10

Case Name : HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE

Invoice No. : 101077

Invoice Date : 11/29/2010

Total Due : \$ 492.80

REF. DOC.

Remit To: **LEX Reporting Service, Inc.**  
160 Broadway, 14th Floor  
New York, NY 10038

**PAYMENT WITH CREDIT CARD**

Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

**EXHIBIT H**





REPORTING SERVICE, INC.

## INVOICE

Invoice No.	Invoice Date	Job No.
101077	11/29/2010	81287
Job Date	Case No.	
9/15/2010		
Case Name		
HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE		
Payment Terms		
Net 30. After 30, Int. at 1.5% per month		

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

2007-022581-LE

0311027623

I certify that the articles and  
services specified on this invoice  
have been received and verified as  
to the quality and quantity.

TRANSCRIPT

JOHN RYAN, ESQ.

TRANSCRIPT

CRAIG ABRUZZO

HANDLING &amp; DELIVERY

124.00 Pages @ 2.60 322.40

54.00 Pages @ 2.60 140.40

30.00 30.00

TOTAL DUE &gt;&gt;&gt;

\$492.80

Ordered By

CHRISTOPHER AARON S  
CITY OF NEW YORK LAW  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

APPROVED

Invoice Inquiries call 631-543-3566

RECEIVED  
FISCAL SECTION  
NYC LAW DEPT

2010 DEC -1 AM 9:46

0.93

VOUCHERED  
DATE: 12/3/10

Tax ID: 11-3033646

INV. AMT. PAID: \$ 492.80

Phone: 212-788-0303 Fax: 212-788-0357

Please detach bottom portion and return with payment.

V# 20110002619

Job No. : 81287

BU ID : 1-LEXNYC

BILL TO

CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

INV. # 11-101077

Case No. :

SVS. PERIOD

9/15/10

Case Name : HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE

AG. 025

: B/C 0201

Invoice No. : 101077

Invoice Date : 11/29/2010

Total Due : \$ 492.80

REF. DOC.

## PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Remit To: LEX Reporting Service, Inc.  
160 Broadway, 14th Floor  
New York, NY 10038



**EXHIBIT I**

# INVOICE



REPORTING SERVICE, INC.

2010 DEC -2 PM 3:07

Invoice No.	Invoice Date	Job No.
101076	11/29/2010	81272
Job Date	Case No.	
9/14/2010		
Case Name		
HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE		
Payment Terms		
Net 30. After 30, Int. at 1.5% per month		

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

207-022581-LE

037027653

## TRANSCRIPT

LAURA HENIGMAN, ESQ.  
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116.00 Pages @ 2.60 301.60  
30.00 30.00

TOTAL DUE >>>

\$331.60

Ordered By : CHRISTOPHER AARON SEACORD, ESQ. — LE  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

Invoice Inquiries call 631-543-3566

I certify that the articles and services specified on this invoice have been received and verified.

*Chris Seacord*

**APPROVED**

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VOUCHERED  
DATE: 12/3/10

Tax ID: 11-3033646

INV. AMT. PAID: \$ 331.60

Phone: 212-788-0303 Fax: 212-788-0357

Please detach bottom portion and return with payment.

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BILL TO  
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NEW YORK, NY 10007

INV. # 11-101076 Job No. : 81272 BU ID : 1-LENYC  
Case No. : 9/14/10  
Case Name : HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE

SVS. PERIOD 9/14/10 AG. 028 : B/C 0201 : DET OBI 6210  
Invoice No. : 101076 Invoice Date : 11/29/2010  
Total Due : \$ 331.60

REF. DOC.

## PAYMENT WITH CREDIT CARD



Cardholder's Name:  
Card Number:  
Exp. Date: Phone#:  
Billing Address:  
Zip: Card Security Code:  
Amount to Charge:  
Cardholder's Signature:

Remit To: **LEX Reporting Service, Inc.**  
160 Broadway, 14th Floor  
New York, NY 10038

**EXHIBIT J**

2/15/2011 10:50 2126084243

LEX REPORTING

PAGE 02/05

FISCAL UNIT  
NYC LAW DEPT.2011 FEB 16 PM 12:23  
LE**INVOICE**

REPORTING SERVICE, INC.

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Job No.</b>
101080	11/29/2010	81236
<b>Job Date</b>	<b>Case No.</b>	
9/10/2010		
<b>Case Name</b>		
HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE		
<b>Payment Terms</b>		
Net 30. After 30, Int. at 1.5% per month		

74-11

## TRANSCRIPT

JIM QUINN, ESQ.  
HANDLING & DELIVERY

158.00 Pages @ 2.60 410.80  
30.00 30.00

093

**TOTAL DUE >>>****\$440.80**

Ordered By : CHRISTOPHER AARON SEACORD, ESQ.  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

I certify that the articles and  
services specified on this invoice have been  
received and verified as to the quality and  
quantity.

Invoice Inquiries call 631-543-3566

**APPROVED**

=) Payments/Credits: 0.00  
+) Finance Charges/Debits: 0.00  
=) New Balance: \$440.80

2007-022581

*Chris Seacord***VOUCHERED**

DATE: 2/17/11

Tax ID: 11-3033646

Phone: 212-788-0303 Fax: 212-788-0357

INV. AMT. PAID: \$ 440.80

Please detach bottom portion and return with payment.

BILL TO  
CITY OF NEW YORK LAW DEPARTMENT  
FISCAL SECTION  
100 CHURCH STREET, ROOM 5-121  
NEW YORK, NY 10007

V# 20110003948

Invoice No. : 101080  
Invoice Date : 11/29/2010  
Total Due : \$ 440.80

INV. # 11-101080

SUS. PERIOD 9/10/10 TO 9/10/10

AG. 025 : B/C 0201 : DET. OBJ. 6220

REF. DOC. 1

Remit To: LEX Reporting Service, Inc.  
160 Broadway, 14th Floor  
New York, NY 10038

Job No. : 81236  
BU ID : 1-LEXNYC  
Case No. :  
Case Name : HARRIS, TAMARA v. QUEENS COUNTY DISTRICT ATTORNEY'S OFFICE

2011 FEB 15 AM 11:06

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FISCAL UNIT  
NYC LAW DEPT.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
TAMARA HARRIS,

Plaintiff, **DECLARATION  
OF SERVICE**

-against-

08 Civ. 1703 (MKB)

JOAN RITTER, ESQ., JOHN RYAN, ESQ., JIM  
QUINN, ESQ. LAURA HENIGMAN, ESQ. and  
LIEUTENANT STEPHANIE HUNTER,

Defendants.  
----- X

Carlos Montas, declares, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that on August 09, 2012, he served a true and correct copy of the foregoing Notice Of Defendants' Application For Costs Sought Against Plaintiff, the Declaration Of Assistant Corporation Counsel Christopher A. Seacord In Support Of Defendants' Application For Costs Against Plaintiff and annexed exhibits upon the following:

**Tamara M. Harris**

The Law Office of Tamara M. Harris  
350 Broadway  
Suite 400  
New York, New York 10013

by causing to be deposited, a copy enclosed in a properly prepaid mail wrapper to the above address in a post office box in the Borough of Manhattan, City of New York, regularly maintained by the Government of the United States in said City.

Dated: New York, New York  
August 09, 2012

  
\_\_\_\_\_  
Carlos Montas

08 Civ. 1703 (MKB) (LB)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TAMARA HARRIS,

Plaintiff,

-against-

JOAN RITTER, ESQ., JOHN RYAN, ESQ., JIM  
QUINN, ESQ. LAURA HENIGMAN, ESQ. and  
LIEUTENANT STEPHANIE HUNTER,

Defendants.

**NOTICE OF APPLICATION FOR COSTS  
AGAINST PLAINTIFF, BILL OF COSTS,  
DECLARATION OF CHRISTOPHER A.  
SEACORD IN SUPPORT OF DEFENDANTS'  
APPLICATION FOR COSTS AGAINST  
PLAINTIFF AND ANNEXED EXHIBITS**

**MICHAEL A. CARDOZO**

*Corporation Counsel of the City of New York  
Attorney for Defendants  
100 Church Street; Room 2-122  
New York, N.Y. 10007*

*Of Counsel: Christopher A. Seacord  
Tel: (212) 788-0866  
NYCLIS No. 2007-022581*

*Due and timely service is hereby admitted.*

*New York, N.Y. .... 200...*

*..... Esq.*

*Attorney for.....*